

Fighting Fraud Checklist for Governance

Protecting the public purse 2014

October 2014

i) General	Yes	No
1. Do we have a zero tolerance policy towards fraud?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Identified within the Counter Fraud & Corruption Policy Statement, Strategy & Guidance Notes		
2014 Update No amendment required		
2. Do we have the right approach, and effective counter-fraud strategies, policies and plans? Have we aligned our strategy with Fighting Fraud Locally?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Measured against Fighting Fraud Locally and the NAFN Resilience Toolkit		
2014 Update Measured against the Code of Practice on Managing the Risk of Fraud & Corruption		
3. Do we have dedicated counter-fraud staff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Benefits fraud – yes. Internal Audit for other frauds		
2014 Update From September 2015, there will be a dedicated Corporate Fraud Officer to deal with all frauds		
4. Do counter-fraud staff review all the work of our organisation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Internal Audit will cover all other activities apart from Benefits fraud		
2014 Update From September 2015, there will be a dedicated Corporate Fraud Officer to deal with all frauds		
5. Does a councillor have portfolio responsibility for fighting fraud across the council?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action The Portfolio holder for Operations & Assets has responsibility for fighting fraud across the Council		
2014 Update No amendment required		
6. Do we receive regular reports on how well we are tackling fraud risks, carrying out plans and delivering outcomes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Regular reports reported to the Audit & Governance Committee		
2014 Update No amendment required		
7. Have we received the latest Audit Commission fraud briefing presentation from our external auditor?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action		
2014 Update		
8. Have we assessed our management of counter-fraud work against good practice?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action As detailed in various documents		
2014 Update Assessments made against all relevant guidance		
9. Do we raise awareness of fraud risks with:		
<ul style="list-style-type: none"> • new staff (including agency staff)? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Previous action Counter Fraud Policy part of the induction process.		
2014 Update No amendment required		
• existing staff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Policies available on the Intranet and website.		
2014 Update E-learning solution contains Counter Fraud Awareness		
• elected members?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Policies available on the Intranet and website.		
2014 Update E-learning solution contains Counter Fraud Awareness		
• our contractors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Policies available on the website		
2014 Update No amendment required		
10. Do we work well with national, regional and local networks and partnerships to ensure we know about current fraud risks and issues?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Take part in the National Fraud Initiative. Member of the National Anti Fraud Network, the Midlands Fraud Forum and Staffordshire and Midlands Internal Audit Groups		
2014 Update No amendment required		
11. Do we work well with other organisations to ensure we effectively share knowledge and data about fraud and fraudsters?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Take part in the National Fraud Initiative. Member of the National Anti Fraud Network, the Midlands Fraud Forum and Staffordshire and Midlands Internal Audit Groups		
2014 Update No amendment required	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12. Do we identify areas where our internal controls may not be performing as well as intended? How quickly do we then take action?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Completed through Internal Audit plan and agreed management actions. Agreed management actions followed up within 6 months to ensure implemented.		
2014 Update No amendment required		
13. Do we maximise the benefit of our participation in the Audit Commission National Fraud Initiative and receive reports on our outcomes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action At least all recommended matches are investigated. The results of the outcome are reported the Audit & Governance Committee		
2014 Update No amendment required		
14. Do we have arrangements in place that encourage our staff to raise their concerns about money laundering?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Previous action Money Laundering Policy in place		
2014 Update No amendment required		
15. Do we have effective arrangements for:		
• reporting fraud?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Frauds to be reported annually to the Audit & Governance Committee Frauds reported in the Annual Fraud Survey		
2014 Update No amendment required		
• recording fraud?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action All frauds recorded		
2014 Update No amendment required		
16. Do we have effective whistle-blowing arrangements? In particular are staff:		
• aware of our whistle-blowing arrangements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action The policy is available on the website and intranet and awareness part of the e learning solution		
2014 Update Delay in the roll out of the e learning solution but will be completed during 2015/16		
• confident in the confidentiality of those arrangements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action The staff named as contact officers should give rise to the staff being confident that confidentiality will be maintained		
2014 Update No amendment required		
• confident that any concerns raised will be addressed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action The staff named as contact officers should give rise to the staff being confident that their concerns will be addressed		
2014 Update No amendment required		
17. Do we have effective fidelity insurance arrangements?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action Adequate insurance arrangements are in place		
2014 Update No amendment required		
ii) Fighting fraud with reduced resources		
18. Are we confident that we have sufficient counter-fraud capacity and capability to detect and prevent fraud, once SFIS has been fully implemented?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action Fraud risks are assessed on a quarterly basis		
2014 Update On the implementation of SFIS, the authority will retain a benefits investigator who will then become the Corporate Investigations Officer so there will be sufficient capacity and capability		

19. Did we apply for a share of the £16 million challenge funding from DCLG to support councils in tackling non-benefit frauds after the SFIS is in place?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action		
2014 Update A Staffordshire wide fraud hub was considered		
20. If successful, are we using the money effectively?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action		
2014 Update		
iii) Current risks and issues		
Housing tenancy		
21. Do we take proper action to ensure that we only allocate social housing to those who are eligible?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action Allocations Policy and procedures in place Internal audit of systems		
2014 Update No amendment required		
22. Do we take proper action to ensure that social housing is occupied by those to whom it is allocated?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action Tenancy checks completed Illegal subletting initiative completed		
2014 Update The Corporate Investigation Officer will be working with the Housing department in these areas		
Procurement		
23. Are we satisfied our procurement controls are working as intended?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action Regular audits are completed		
2014 Update No amendment required		
24. Have we reviewed our contract letting procedures in line with best practice?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action Financial guidance, which contains Procurement procedures is updated on a regular basis		
2014 Update No amendment required		
Recruitment		
25. Are we satisfied our recruitment procedures that:		
• prevent us employing people working under false identities?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action Recruitment procedures in place to ensure that identities are checked		
2014 Update No amendment required		
• confirm employment references effectively?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Previous action References are checked as part of the recruitment process		
2014 Update No amendment required		
• ensure applicants are eligible to work in the UK?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Previous action Eligibility checked as part of the recruitment process		
2014 Update No amendment required		
<ul style="list-style-type: none"> require agencies supplying us with staff to undertake the checks that we require? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Agencies are required to complete recruitment checks to the same standard		
2014 Update No amendment required		
Personal budgets	N/A	
26. Where we are expanding the use of personal budgets for adult social care, in particular direct payments, have we introduced proper safeguarding proportionate to risk and in line with recommended good practice?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action		
2014 Update		
27. Have we updated our whistle-blowing arrangements, for both staff and citizens, so that they may raise concerns about the financial abuse of personal budgets?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action		
2014 Update		
Council tax discount		
28. Do we take proper action to ensure that we only award discounts and allowances to those who are eligible?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Work completed on NFI SPD review as well as county initiative		
2014 Update No amendment required		
Housing benefit		
29. When we tackle housing benefit fraud do we make full use of:		
<ul style="list-style-type: none"> The National Fraud Initiative? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Completed		
2014 Update No amendment required		
<ul style="list-style-type: none"> The Department for Work and Pensions Housing Benefit matching service? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Completed		
2014 Update No amendment required		
<ul style="list-style-type: none"> internal data matching? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Completed if required		
2014 Update No amendment required		
<ul style="list-style-type: none"> private sector data matching? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Previous action Completed if required		
2014 Update No amendment required		

iv) Other fraud risks		
30. Do we have appropriate and proportionate defences against the following fraud risks:		
• business rates?	<input checked="" type="checkbox"/>	Y
Previous action Emerging fraud risks are identified and controls tested		
2014 Update No amendment required		
• Right to Buy?	<input checked="" type="checkbox"/>	Y
Previous action Emerging fraud risks are identified and controls tested		
2014 Update No amendment required		
• council tax reduction?	<input checked="" type="checkbox"/>	Y
Previous action Emerging fraud risks are identified and controls tested		
2014 Update No amendment required		
• schools?	<input type="checkbox"/>	Y
Previous action N/A		
2014 Update		
• grants?	<input type="checkbox"/>	Y
Previous action Emerging fraud risks are identified and controls tested		
2014 Update No amendment required		

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